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JAN 25 1993

Before the FCC MAIL ROOM
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 26 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket _____
Table of Allotments,) RM - _____
FM Broadcast Stations)
(American Falls, Idaho))

To: The Commission

PETITION FOR RULE MAKING

Comes now Dobson, Goss, Ronas & Dahl, permittee of Station KOUU(FM), Channel 281A at American Falls, Idaho, pursuant to Section 1.401 of the Commission's Rules, and respectfully petitions the Commission to amend the FM Table of Allotments, 47 C.F.R. 73.202(b), to substitute FM Channel 281C1 for Channel 281A at American Falls, Idaho, and the modification of the KOUU(FM) construction permit to specify operation on the higher-class channel.

Proposal of Petitioner:

<u>City</u>	<u>Channel Numbers</u>	
	<u>Present</u>	<u>Proposed</u>
American Falls, Idaho	281A	281C1

No. of Copies rec'd
List A B C D E

045

In support of this proposal, the following information is submitted for consideration:

American Falls (population 3,757) 1/ is an incorporated city located in southeastern Idaho, approximately 35 kilometers west-southwest of Pocatello, Idaho. It is the county seat of Power County, Idaho (population 7,086). Adoption of this proposal will provide American Falls and Power County with its first wide-coverage FM station.

Attached hereto and made a part of this petition is a Technical Exhibit in support of the requested change in the Table of Allotments. Based on the information contained therein, it appears that the proposed channel substitution could be accomplished in compliance with the minimum distance requirements of Section 73.207(b) of the Commission's Rules at the site presently authorized for Station KOUU(FM).

1/ Population figures from the 1990 U.S. Census.

If this proposal is adopted, Dobson, Goss, Rones & Dahl will file an application seeking Class C1 facilities for KOUU(FM). When granted, Dobson, Goss, Rones & Dahl will immediately construct Class C1 facilities for Station KOUU(FM).

WHEREFORE, it is respectfully requested that the instant petition be granted and that the FM Table of Allotments, Section 73.202(b), be amended as requested herein.

Respectfully submitted,

DOBSON, GOSS, RONES & DAHL

Jerome J. Dobson

Jerome J. Dobson, Partner
7121 Maryland
St. Louis, MO 63130

By:

CONTEMPORARY COMMUNICATIONS

Larry G. Guss

Larry G. Guss, Consultant
Post Office Box 1787
Cleveland, MS 38732
Phone: (601) 846-1787
Fax: (601) 843-0494

January 15, 1993

AFFIDAVIT OF PETITIONER

State of Missouri)
) ss.
County of St. Louis)

I, Jerome J. Dobson, hereby verify that the statements contained herein are true and correct to the best of my knowledge and belief.

Jerome J. Dobson
Jerome J. Dobson

Sworn to and subscribed before me, this 18 day of January, 1993.

Jay E. Sushefsky
Notary Public

My Commission Expires: JAY E. SUSHELKY
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES 9/24/96
CITY OF ST. LOUIS

TECHNICAL EXHIBIT

**IN SUPPORT OF
PETITION FOR RULE MAKING**

**SUBSTITUTION OF FM CHANNEL 281C1
FOR FM CHANNEL 281A
AT AMERICAN FALLS, IDAHO
AND MODIFICATION OF CONSTRUCTION PERMIT
OF KOUU(FM) TO SPECIFY OPERATION
ON THE HIGHER-CLASS CHANNEL**

DOBSON, GOSS, RONES & DAHL

Prepared January 13, 1993

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TECHNICAL EXHIBIT

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DOBSON, GOSS, RONES & DAHL

INTRODUCTION

This Technical Exhibit supports the petition of Dobson, Goss, Rones & Dahl, seeking to amend the FM Table of Allotments, Section 73.202(b) of the Rules, by substituting FM Channel 281C1 for FM Channel 281A 1/ at American Falls, Idaho, and the concomitant modification of the construction permit of Station KOUU(FM) to specify operation on the higher-class channel.

ALLOCATION

A study was performed using the computerized *SEARCHFM* frequency search program and the current FCC/NTIS database to determine if Channel 281C1 could be allocated to American Falls in compliance with the minimum distance separation

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requirements of Section 73.207(b) of the Commission's Rules. The results of that study indicate that Channel 281C1 could be substituted for Channel 281A, in full compliance with Section 73.207(b), at the site presently authorized for Station KOUU(FM).

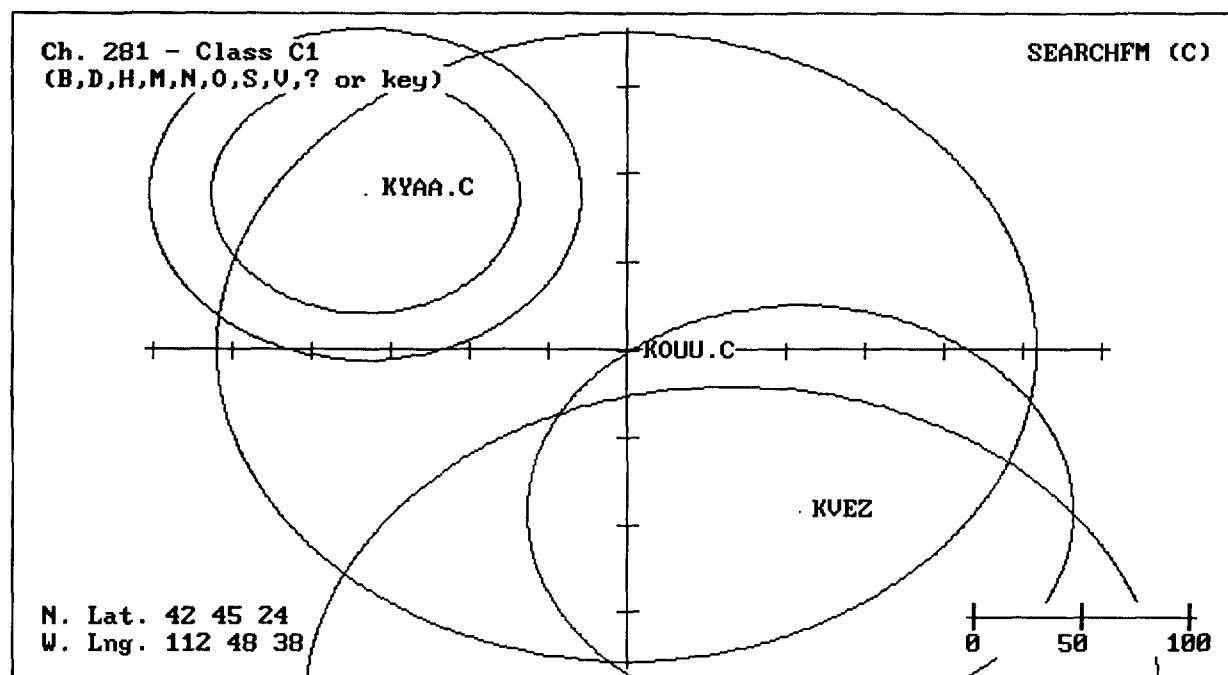
CONCLUSION

As noted above, the proposed change in the table of allotments will not create a short-spacing to any existing station, pending application or vacant allotment, and will not require the reallocation of any station, pending application or vacant allotment.

A copy of the separation study for Channel 281C1 is attached hereto as Exhibit A and made a part of this report (only those stations and channels sufficiently close for concern are listed therein).

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BROADCAST CONSULTANTS



Search 01-13-93

Data 11-25-92

Current rules spacings

----- CHANNEL 281 -104.1 MHz -----

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KOUU.C	281A	American Falls	ID	0.0	0.00	200.0	-200.00 *
CP HN	42 45 24	112 48 38	3.000 kW	100M	0.0	124.3	
		Dobson, Gross, Rones, & Dahl				BPH900319ML	
KVEZ	280A	Smithfield	UT	141.3	134.40	133.0	1.40 <
LI CN	41 48 44	111 47 31	3.000 kW	-40M	83.5	82.7	
		M & M Broadcasting Co., Inc.				BLH830311AK	
KSOPFM	282C	Salt Lake City	UT	167.7	238.35	209.0	29.35
LI CN	40 39 35	112 12 05	25.000 kW	1109M	148.1	129.9	
		KSOP, Inc.				BLH7567	
KSKIFM	279C	Sun Valley	ID	307.4	162.26	105.0	57.26
LI CN	43 38 36	114 23 49	53.000 kW	582M	100.8	65.3	
		Sun Valley Radio, Inc.				BLH911009KC	
KYAA.C	284A	Ketchum	ID	307.4	162.26	75.0	87.26
CP CN	43 38 36	114 23 49	0.155 kW	586M	100.8	46.6	
		Jim Kincer				BPH900731MC	

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AFFIDAVIT

State of Mississippi }
County of Bolivar } ss.

Larry G. Fuss, being first duly sworn, deposes and states as follows:

- 1) I am a qualified and experienced broadcast consultant. I have been actively involved in the broadcast industry since 1972 and currently hold a lifetime FCC General Class Radio Telephone License (License No. PG-8-8450).
- 2) I have prepared numerous applications and rule making petitions which have been accepted for filing with the Federal Communications Commission.
- 3) I have been retained by Dobson, Goss, Rones & Dahl to prepare the attached Technical Exhibit.
- 4) The Technical Exhibit, of which this deposition is a part, and the measurements, calculations, studies and determinations upon which this report is based, were prepared by me or under my direction. All material contained therein is believed to be true and correct, to the best of my knowledge and belief.

Larry G. Fuss
Larry G. Fuss
Affiant

JANUARY 13, 1993
Date

Subscribed and sworn to before me this 13 day of January, 1993.

Victor Z. Taylor
Notary Public

My commission expires: _____